

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	Case No. 1:20-CR-00688
)	
Plaintiff,)	Honorable John J. Tharp Jr.
)	
vs.)	
)	
HYTERA COMMUNICATIONS)	
CORPORATION LTD., et al.)	
)	
Defendant.)	
)	
)	
)	

MOTION TO FILE ADDITIONAL MATERIAL UNDER SEAL

Pursuant to the Agreed Amended Protective Order (“PO”) entered by the Court on November 13, 2025 (Dkt. 375), Motorola Solutions, Inc. (“Motorola”) respectfully moves this Honorable Court for an order allowing the filing under seal of additional portions of its Nonparty Victim Motorola Solutions, Inc.’s Victim Statement Regarding Hytera’s Sentencing (“Statement”); portions of the Declaration of Laura Vartain Horn in Support of Motorola’s Victim Statement (“Vartain Declaration”), attached as Ex. E to the Statement; and exhibit 2 attached to the Vartain Declaration.

On November 19, 2025, pursuant to the PO, Motorola filed portions of its Statement, exhibits A and B attached to the Statement, portions of the Vartain Declaration, and exhibits 1, 3, 5–7 attached to the Vartain Declaration provisionally under seal. Dkt. 394.

On November 24, 2025, the Court granted Motorola’s motion, permitting the portions of the Statement, Vartain Declaration, and requested exhibits to remain under seal pursuant to the PO. Dkt. 400.

On November 26, 2025, Hytera requested additional redactions to Motorola's Statement and Vartain Declaration, as well as a request to file exhibit 2 to the Vartain Declaration under seal. Motorola does not object.

Pursuant to the PO, five business days have passed since Motorola's service on November 19, 2025, of unredacted copies of the Statement and all exhibits on the Court and counsel of record. Since Hytera requested limited additional redactions to the Statement and filing an additional exhibit under seal—and did not object to Motorola's remaining sealing requests, Motorola will file the papers publicly, with the approved redactions and sealed exhibits if this Motion is granted.

For the above reasons, Motorola respectfully requests that this Court enter an order allowing the filing under seal of the additional portions of the Statement, Vartain Declaration and exhibit 2 as requested above.

Dated: November 26, 2025

Respectfully submitted,

/s/ Mark E. Schneider

Mark E. Schneider, P.C.
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza
Chicago, Illinois 60654
(312) 862-2253

Laura Vartain Horn (*Pro Hac Vice*)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
(415) 439-1500

Counsel for Motorola Solutions, Inc.

CERTIFICATE OF SERVICE

I, Mark Schneider, an attorney, hereby certify that on November 26, 2025, I caused a true and correct copy of the foregoing document to be served via the Court's ECF system upon all counsel of record.

Dated: November 26, 2025

/s/ Mark E. Schneider

Mark E. Schneider